

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

LuAnne Janssen, as Personal Representative of
the Estate of Warren S. Lindvold,

Plaintiff,

-vs-

City of Valley City,
Christopher Olson,
Wade Hannig,
Barnes County,
Barnes County Sheriff Randy McClafin,
Jenna Jochim,
Julie Forsman
Richard Chase,
Bruce Potts,
Jesse Burchill,
Barnes County Ambulance, Inc.,
National Medical Resources, Inc.,
Mercy Hospital of Valley City d/b/a CHI Mercy
Health,

Defendants.

Civil No. 3:19-cv-79

**STIPULATION FOR DISMISSAL
WITH PREJUDICE**

[¶1] WHEREAS the parties are mutually desirous of having the Court enter an order dismissing, in total, on the merits and with prejudice any and all claims and causes of action set forth in Plaintiff's complaint and amended complaint against Defendants City of Valley City, Christopher Olson and Wade Hannig (the "City Defendants") and Barnes County, Randy McClafin, Jenna Jochim, Julie Forsman, Richard Chase, Bruce Potts, Jesse Burchill and Barnes County Ambulance, Inc. (the "County Defendants") and any and all other claims and/or causes of action which were, could have or were required to be asserted by Plaintiff, for herself, Warren S. Lindvold, the Estate of Warren S. Lindvold, and Warren Lindvold's heirs, devisees and successors in interest against the City Defendants and County Defendants. The parties shall be responsible for their own costs, disbursements and attorneys' fees incurred herein.

[¶2] NOW, THEREFORE it is hereby stipulated and agreed as follows:

The court shall enter an order and judgment dismissing, in total, on the merits and with prejudice, the claims and causes of action set forth in Plaintiff's complaint and amended complaint, against the City Defendants and County Defendants, and any and all other claims and/or causes of action which were, could have or were required to be asserted by Plaintiff, for herself, Warren S. Lindvold, the Estate of Warren S. Lindvold, and Warren S. Lindvold's heirs, devisees and successors in interest against the City Defendants and County Defendants, and ordering that each party be responsible for their own costs, disbursements and attorneys' fees incurred herein.

/s/ Alan Baker

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Dated: November 12, 2020

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Dated: November 12, 2020

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Burchill and Barnes County Ambulance, Inc.*
Dated: November 12, 2020